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VIA ECF

The Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *The New York Times Company v. United States Department of
State*, No. 22-cv-00791

Dear Judge Oetken:

I am counsel for plaintiff The New York Times Company (“The Times”) in the above-captioned action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I submit this letter on behalf of all parties pursuant to the Court’s March 25, 2022, Order (Dkt. No. 12).

Since the parties’ last status update (Dkt. No. 11), the State Department has finished identifying the records potentially responsive to the requests at issue. While relevancy review is ongoing and the numbers are therefore subject to change, the State Department has identified approximately 3,610 potentially responsive documents totaling approximately 89,400 pages. Consequently, the parties are currently negotiating ways to potentially narrow the scope of the requests. In light of this, the parties respectfully request that the Court permit the parties to submit a further status report on May 13, 2022, advising the Court of the parties’ progress.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ David McCraw

David McCraw

cc: All counsel of record (via ECF)